

No. 13-19-00486-CV

IN THE COURT OF APPEALS FOR THE
THIRTEENTH JUDICIAL DISTRICT OF TEXAS
CORPUS CHRISTI-EDINBURG

FILED IN
THE COURT OF APPEALS
CORPUS CHRISTI/EDINBURG, TEXAS
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KATHY S. MILLS
Clerk

MSW Corpus Christi Landfill, Ltd.,
Appellant and Cross-Appellee
v.
Gulley-Hurst, L.L.C.,
Appellee and Cross-Appellant

Appeal from 117th District Court, Nueces County, Texas

**MSW CORPUS CHRISTI LANDFILL'S
UNOPPOSED MOTION TO EXPAND WORD COUNT**

TO THE HONORABLE THIRTEENTH COURT OF APPEALS:

COMES NOW MSW Corpus Christi Landfill, Ltd. and files its Unopposed Motion to Expand Word Count, and for cause would show:

On this date, MSW has filed its Appellant's Brief. The word count totals 22,349. MSW's counsel made every effort to write its brief as concisely as possible. The reason for the overage stems from the fact that, first, the Clerk's Record is over 3,400 pages long and the Reporter's Record is 26 volumes with exhibits. Second, and related, record references count as words. This case has an extensive procedural history, then went through a 2+ week jury trial. MSW presents seven issues on appeal. Providing the Court with a Statement of Facts and Procedural History (with

record references) – all of which is germane to the Issues Presented, comprised a significant portion of the brief.

The undersigned has conferred with opposing counsel, who states that he does not oppose this motion.

PRAYER

WHEREFORE, MSW Corpus Christi Landfill, Ltd. respectfully prays the Court to grant its unopposed motion to expand the word count of its Appellant's Brief, and for all other relief to which it is entitled.

Respectfully submitted,

/s/ Audrey Mullert Vicknair

Audrey Mullert Vicknair

State Bar No. 14650500

LAW OFFICE OF AUDREY MULLERT VICKNAIR

802 N. Carancahua, Ste. 2100

Corpus Christi, Texas 78401-0038

361-884-5400; 361-884-5401 fax

avicknair@vicknairlaw.com

KILPATRICK TOWNSEND & STOCKTON LLP

/s/ Patrick J. Carew

Patrick J. Carew

State Bar No. 24031919

2001 Ross Avenue, Ste. 4400

Dallas, Texas 75201

(214) 922-7100; (214) 279-5178 fax

pcarew@kilpatricktownsend.com

cbarbaree@kilpatricktownsend.com

AND

THE MARYE LAW FIRM, P.C.
/s/ Monica I. Bohuslav
Monica I. Bohuslav
State Bar No. 24074250
2619 Hibernia Street
Dallas, Texas 75204
(214) 987-8240; (214) 987-8241 fax
mbohuslave@maryelaw.com

Counsel for Appellant MSW Corpus Christi Landfill, Ltd.

CERTIFICATE OF CONFERENCE

The undersigned certifies that she has conferred with opposing counsel, Mr. John Bell, who states he does not oppose the relief requested in this motion.

/s/ Audrey Mullert Vicknair
Audrey Mullert Vicknair

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing motion was served on counsel for the Appellee, as designated below, on this the 16th day of October, 2020, by tex.gov electronic filing service:

John D. Bell
WOOD, BOYKIN & WOLTER
615 N. Upper Broadway, Suite 1100
Corpus Christi, Texas 78401
(361) 888-9201; (361) 888-8353 fax

Douglas A. Allison
LAW OFFICES OF DOUGLAS A. ALLISON
403 North Tancahua Street
Corpus Christi, Texas 78401
(361) 888-6002; (361) 888-6651 fax
doug@dallisonlaw.com

Attorneys for Defendant Gulley-Hurst

/s/ Audrey Mullert Vicknair
Audrey Mullert Vicknair

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Audrey Vicknair
Bar No. 14650500
avicknair@vicknairlaw.com
Envelope ID: 47281956
Status as of 10/19/2020 8:44 AM CST

Associated Case Party: MSW Corpus Christi Landfill, Ltd.

Name	BarNumber	Email	TimestampSubmitted	Status
Patrick James Carew	24031919	pcarew@kilpatricktownsend.com	10/16/2020 6:18:33 PM	SENT
Audrey Vicknair	14650500	avicknair@vicknairlaw.com	10/16/2020 6:18:33 PM	SENT
Monica Bohuslav	24074250	mbohuslav@maryelaw.com	10/16/2020 6:18:33 PM	SENT

Associated Case Party: Gulley-Hurst, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Douglas A. Allison	1083500	doug@dallisonlaw.com	10/16/2020 6:18:33 PM	SENT
John David Bell	2078900	jdbell@wbwpc.com	10/16/2020 6:18:33 PM	SENT